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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA,

1:23-cv-00582-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**TWO (2) REAL PROPERTIES
(DEFENDANT REAL PROPERTIES),
LOCATED IN JOSEPHINE COUNTY,
STATE AND DISTRICT OF OREGON
WITH BUILDINGS, APPURTENANCES,
AND IMPROVEMENTS, *in rem*,**

Defendants.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, consisting of two (2) pieces of real property (hereinafter, DEFENDANT REAL PROPERTIES), are further described as:

Defendant Real Property 1 - 1530 Thompson Creek Road, Selma, Oregon.

(Property ID R327419 and R3274192)

Commencing at the Northwest corner of the Northeast Quarter of the Southwest Quarter of Section 21, Township 38 South, Range 7 West of the Willamette Meridian, Josephine County, Oregon; thence South along the West line of said Northeast Quarter of the Southwest Quarter, 270.13 feet, more or less, to the Northeasterly line of Thompson Creek Road; thence Southeasterly along said line, 309.2 feet, more or less, to a point which bears 525 feet South from the North line of said Northeast Quarter of the Southwest Quarter for the true point of beginning; thence East, parallel to the North line of said Northeast Quarter of the Southwest Quarter to the centerline of Thompson Creek; thence Southerly along said centerline to the Northerly right of way line of said Thompson Creek Road; thence Northerly along said right of way line to the true point of beginning. LESS AND EXCEPT all that portion lying Southerly of the following described line; Commencing at the Southeast corner of the Northeast Quarter of the Southwest Quarter of Section 21, Township 38 South, Range 7 West of the Willamette Meridian, Josephine County, Oregon; thence North along the East line of said Northeast Quarter of the Southwest Quarter, 220 feet 8 inches; thence North 65 degrees 13' 00" East to the centerline of Thompson Creek for the true point of beginning of said line; thence South 65 degrees 13' 00" West to the Northeasterly right of way line of Thompson Creek Road for the terminus of said line.

Defendant Real Property 2 - 1100 Panther Gulch Road, Williams, Oregon.

(Property ID R328253 and R3282532)

A parcel of land in the Southeast Quarter of Section 2, Township 39 South, Range 5 West of the Willamette Meridian, Josephine County, Oregon being more particularly described as follows:

Beginning at the Southwest corner of the Southeast Quarter of the Southeast Quarter of said Section 2; thence along the West line of said Southeast Quarter of the Southeast Quarter, North 30.00 feet to the North right of way line of Panther Gulch Road, which is the true point of beginning; thence along said West line North 1290 feet to the Southeast 1/16 corner; thence West 1320 feet to the center South 1/16 corner; thence North 1320.00 feet to the center Quarter corner; thence East 2640.00 feet to the East Quarter corner; thence along the East line of said Southeast Quarter South 1235 feet, more or less, to a point 1405.00 feet North of the Southeast corner of said Southeast Quarter; thence parallel to the South line of said Southeast Quarter, West 1260.00 feet, more or less, to a point 60.00 feet East of the West line of the East Half of said Southeast Quarter; thence parallel to said West line, South 1375.00 feet to the North right of way line of Panther Gulch Road; thence West 60.00 feet back to the true point of beginning.

III.

DEFENDANT REAL PROPERTIES are now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTIES are located in the State of Oregon, Josephine County.

IV.

DEFENDANT REAL PROPERTIES, *in rem*, represent property used or intended to be used to facilitate the manufacture and distribution of controlled substances in violation of 21 U.S.C. §§ 841, 846, and 856 and are forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of Colleen Anderson, Special Agent, Internal Revenue Service-Criminal Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

COUNT 2

V.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

VI.

DEFENDANT REAL PROPERTIES are now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTIES are located in the State of Oregon, Josephine County.

VII.

DEFENDANT REAL PROPERTIES, *in rem*, represent property involved in money laundering in violation of 18 U.S.C. § 1956, and are forfeitable to the United States pursuant to

the provisions of 18 U.S.C. § 981(a)(1)(A), as more particularly set forth in the declaration of Colleen Anderson, Special Agent, Internal Revenue Service-Criminal Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTIES, *in rem*, that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: April 20, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Katherine C. De Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney

VERIFICATION

I, AGENT COLLEEN ANDERSON, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service-Criminal Investigations and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Colleen Anderson
COLLEEN ANDERSON
Special Agent
Internal Revenue Service- Criminal Investigations